

EXHIBIT G

In the United States Court
Eastern District of Texas
Tyler Division

Kinsale Insurance Company	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 6:19-cv-413-JCB
	§	
ETOPSI Oil & Gas L.L.C. dba,	§	
East Texas Oilfield Production	§	
SCV, Inc. and McBride	§	
Operating, L.L.C.	§	
	§	
Defendants.	§	

DEFENDANT, MCBRIDE OPERATING, L.L.C.'S
INITIAL DISCLOSURE

TO: Plaintiff, Kinsale Insurance Company, by and through their attorney of record, Lisa Henderson c/o CLYDE & CO, 10440 N. Central Expressway, Suite 800, Dallas, TX 75231.

PURSUANT to the Rules of Federal Procedure, Defendant, MCBRIDE

OPERATING, L.L.C. makes and files the following disclosure:

- The name and, if known, the address and telephone number of each individual likely to have discoverable information - along with the subjects of that information - that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;**

ANSWER:

Kinsale Insurance Company
and/or its agent
c/o Lisa Henderson
Clyde & Co.
10440 N. Central Expressway, Suite 800
Dallas, TX 75231
214/540-7539

These individuals may testify as to the coverage requested by and/or provided to Defendant, ETOPSI.

Dan Kennedy
Larry Stallings
ETOPSI
c/o Linda Dedman
Dedman Law, PLLC
12720 Hillcrest Road, Suite 1042
Dallas, TX 75230
214/361-8885

These individuals may testify as to the coverage requested from and/or provided by Plaintiff, Kinsale Insurance Company.

Joseph McBride
McBride Operation, L.L.C.
c/o Ron Adkison
Adkison Law Firm
300 W. Main
Henderson, TX 75652
903/657-8545

This individual will testify as the factual issues and circumstances surrounding the underlying state court action.

Ron Adkison
Adkison Law Firm
300 W. Main
Henderson, TX 75652
903/657-8545

This individual is not a retained expert but Defendant, McBride Operating, L.L.C.'s attorney and may testify as to the customary and reasonable attorney's fees in this case.

Defendant herein adopts and incorporates herein any and all individuals designated by any other parties.

2. A copy-or a description by category and location- of all documents electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

ANSWER: The state court petition and in the insurance contract are in the possession of all parties.

3. A computation of each category of damages claimed by the disclosing party- who must also make available for inspection and copying as under Rule 34 of the documents or other evidentiary material, unless privileged or protected from disclosure, on which computation is based, including materials bearing on the nature and extent of injuries suffered; and

ANSWER: McBride's damages in the underlying state court action amount to approximately \$1,714,287.59 plus attorney's fees and expenses.

4. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment.

ANSWER: None, not already produced.

Respectfully submitted,

ADKISON LAW FIRM
300 West Main
Henderson, Texas 75652
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By: /s/ Ron Adkison
Ron Adkison
State Bar No. 00921090
Attorney for McBride Operating, L.L.C.

Certificate of Service

On the 8th day of January, 2020, the undersigned hereby certifies that the foregoing was served upon all Counsel of Record as per the Federal Rules of Civil Procedure.

/s/ Ron Adkison

Ron Adkison